

James E. Cecchi  
Kevin Cooper  
**CARELLA, BYRNE, CECCHI,  
BRODY & AGNELLO, P.C.**  
5 Becker Farm Road  
Roseland, New Jersey 07068  
Tel.: (973) 994-1700  
Fax: (973) 994-1744  
jcecchi@carellabyrne.com  
kcooper@carellabyrne.com

*Liaison Counsel for Lead Plaintiffs*

Steven B. Singer (*pro hac vice*  
forthcoming)  
Sara DiLeo (*pro hac vice*)  
**SAXENA WHITE P.A.**  
10 Bank Street, Suite 882  
White Plains, NY 10606  
Tel.: (914) 437-8551  
Fax: (888) 216-2220  
ssinger@saxenawhite.com  
sdileo@saxenawhite.com

*Counsel for Lead Plaintiffs and Lead  
Counsel for the Class*

*[Additional Counsel on Signature Page]*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

CHRISTOPHER ARBOUR, Individually  
and on Behalf of All Others Similarly  
Situated,

Plaintiff,

v.

TINGO GROUP, INC. F/K/A MICT, INC.,  
DOZY MMOBUOSI, DARREN MERCER,  
and KEVIN CHEN,

Defendants.

Case No. 2:23-cv-03151-ES-MAH

Hon. Esther Salas

CLASS ACTION

**NOTICE OF LEAD PLAINTIFFS' VOLUNTARY DISMISSAL**

TO: ALL PARTIES AND THEIR COUNSEL OF RECORD:

WHEREAS, on June 8, 2023, the above-captioned securities fraud class action was filed asserting claims under Sections 10(b) and 20(a) of the Securities Exchange Act of 1934, 15 U.S.C. § 78j(b) and 78t(a), and SEC Rule 10b-5 promulgated thereunder, 17 C.F.R. § 240.10b-5 (ECF No. 1);

WHEREAS, by Order dated February 14, 2024, the Court appointed Perdeep Kanda and Pavel Krykhtin as Lead Plaintiffs (hereinafter, “Lead Plaintiffs”), and approved Lead Plaintiffs’ selection of Saxena White P.A. as Lead Counsel and Carella, Byrne, Cecchi, Brody & Agnello, P.C. as Liaison Counsel for the putative class (ECF No. 51);

WHEREAS, by Order dated August 21, 2024, the Court ordered that Lead Plaintiffs file their Amended Consolidated Class Action Complaint (the “Amended Complaint,”) by September 20, 2024, and that defendants file any answer or otherwise respond to the Amended Complaint by November 4, 2024 (ECF No. 72);

WHEREAS, on September 20, 2024, Lead Plaintiffs filed their Amended Complaint (ECF No. 73);

WHEREAS, on October 17, 2024, the Court granted Defendant Darren Mercer’s request that the deadline to answer or otherwise respond to the Amended Complaint be extended from November 4, 2024 to December 4, 2024 (ECF No. 75);

WHEREAS, on November 26, 2024, the Court granted Defendant Darren Mercer's request that the deadline to answer or otherwise respond to the Amended Complaint be extended from December 4, 2024 to February 7, 2024 (ECF No. 77);

WHEREAS, a class has not been certified in this action, and no defendant in this action has served an answer or motion for summary judgment.

NOTICE IS HEREBY GIVEN that, pursuant to Federal Rule of Civil Procedure 41(a)(1), Lead Plaintiffs hereby voluntarily dismiss the above-captioned action, without prejudice, as to all defendants.

Dated: December 18, 2024

Respectfully submitted,

**CARELLA, BYRNE, CECCHI, BRODY  
& AGNELLO, P.C.**

By: /s/ James E. Cecchi

James E. Cecchi

Kevin Cooper

5 Becker Farm Road

Roseland, New Jersey 07068

Tel: (973) 994-1700

Fax: (973) 994-1744

jcecchi@carellabyrne.com

kcooper@carellabyrne.com

*Liaison Counsel for Lead Plaintiffs*

**SAXENA WHITE P.A.**

Steven B. Singer (*pro hac vice* forthcoming)

Sara DiLeo (*pro hac vice*)

Marco A. Dueñas (*pro hac vice*)

10 Bank Street, Suite 882

White Plains, NY 10606

Tel.: (914) 437-8551  
Fax: (888) 216-2220  
ssinger@saxenawhite.com  
sdileo@saxenawhite.com  
mduenas@saxenawhite.com

-and-

Scott M. Koren (*pro hac vice*)  
7777 Glades Road, Suite 300  
Boca Raton, FL 33434  
Tel.: (561) 394-3399  
Fax: (561) 394-3382  
skoren@saxenawhite.com

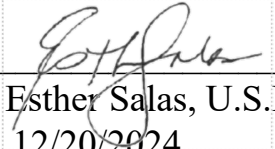
*Counsel for Lead Plaintiffs and Lead  
Counsel for the Class*

**THE SCHALL LAW FIRM**

Brian Schall (*pro hac vice* forthcoming)  
2049 Century Park East, Suite 2460  
Los Angeles, CA 90067  
Tel.: (310) 301-3335  
brian@schallfirm.com

*Additional Counsel for Lead Plaintiffs*

SO ORDERED,

  
\_\_\_\_\_  
Hon. Esther Salas, U.S.D.J.  
Date: 12/20/2024

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on December 17, 2024, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send a notice of electronic filing to all registered users.

/s/ James E. Cecchi  
James E. Cecchi